

1 THOMAS V. CHRISTOPHER  
2 (STATE BAR NO. 185928)  
3 thomas@thomaschristopherlaw.com  
4 THE LAW OFFICES OF THOMAS V.  
5 CHRISTOPHER  
6 415 Mission Street, 37<sup>th</sup> Floor  
7 San Francisco, CA 94105  
8 Telephone: +1 415 659 1805  
9  
10 *Attorney for Plaintiff*  
11 3taps, Inc.

12 ANNETTE L. HURST (SBN 148738)  
13 ahurst@orrick.com  
14 RUSSELL P. COHEN (SBN 213105)  
15 rcohen@orrick.com  
16 DANIEL JUSTICE (SBN 291907)  
17 djustice@orrick.com  
18 NATHAN SHAFFER (SBN 282015)  
19 nshaffer@orrick.com  
20 SARAH K. MULLINS (SBN 324558)  
21 sarahmullins@orrick.com  
22 MARIA N. SOKOVA (SBN 323627)  
23 msokova@orrick.com  
24 ORRICK, HERRINGTON & SUTCLIFFE LLP  
25 The Orrick Building  
26 405 Howard Street  
27 San Francisco, CA 94105-2669  
28 Telephone: +1 415 773 5700  
Facsimile: +1 415 773 5759

10  
11 *Attorneys for Defendant*  
12 *LinkedIn Corporation*

13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15 SAN FRANCISCO DIVISION

16 3taps, Inc.,  
17 Plaintiff,  
18 vs.  
19 LinkedIn Corporation,  
20 Defendant.

21 Case No. 18-cv-00855-EMC  
22 **STIPULATION AND [PROPOSED]**  
23 **ORDER CONTINUING CASE**  
24 **MANAGEMENT CONFERENCE**

25 CMC: October 19, 2021  
26 Time: 2:30 p.m.

27 Judge: Hon. Edward M. Chen  
28 Trial Date: None Set  
Action Filed: February 8, 2018

1           WHEREAS, Plaintiff 3taps, Inc. (“3taps”) filed a Complaint in the above-captioned action  
 2 against Defendant LinkedIn Corporation (“LinkedIn”) on February 08, 2018 (ECF No. 1);

3           WHEREAS, on August 13, 2021, after the expiration of a stay pending appeal in the  
 4 hiQ Action, LinkedIn filed a Motion to Dismiss 3tap’s Complaint (ECF No. 51);

5           WHEREAS, on August 26, 2021, 3taps filed an Opposition to LinkedIn’s Motion to  
 6 Dismiss (ECF No. 53);

7           WHEREAS, the parties subsequently met and conferred, and agreed, in the interests of  
 8 efficiency of the parties and the Court, that LinkedIn would withdraw its Motion to Dismiss  
 9 without prejudice and that 3taps would file an amended complaint;

10          WHEREAS, the parties stipulated to and this Court entered a scheduling order in this case  
 11 whereby 3taps shall file its amended complaint by October 8, 2021; LinkedIn shall answer or  
 12 otherwise respond to the amended complaint by December 7, 2021; if LinkedIn responds to the  
 13 amended complaint by motion, any opposition thereto shall be due on February 7, 2022, and any  
 14 reply shall be due on March 9, 2022 (ECF No. 55);

15          WHEREAS, a Case Management Conference in this case is currently scheduled for  
 16 October 19, 2021 at 2:30PM (ECF No. 49);

17          WHEREAS, the parties have met and conferred, and agree there are no issues they wish to  
 18 raise with the court at a case management conference prior to the completion of briefing on  
 19 LinkedIn’s anticipated motion to dismiss;

20          NOW, THEREFORE, FOR GOOD CAUSE, IT IS HEREBY STIPULATED AND  
 21 AGREED:

22           1. The case management conference currently set for October 19, 2021 at 2:30 p.m. is  
 23           continued to April 5, 2022 at 2:30 p.m.  
 24           2. Nothing in this stipulation or order affects any other deadline in ECF No. 55.

1 Dated: September 23, 2021

Orrick, Herrington & Sutcliffe LLP

2  
3 By: /s/ Annette L. Hurst  
4 ANNETTE L. HURST  
5 Attorney for Defendant  
LinkedIn Corporation

6  
7 Dated: September 23, 2021

The Law Offices of Thomas V. Christopher

8  
9  
10 By: /s/ Thomas V. Christopher  
11 THOMAS V. CHRISTOPHER  
12 Attorneys for Plaintiff  
3taps, Inc.

13  
14  
15 **Filer's Attestation:** I, Annette L. Hurst, am the ECF User whose User ID and password are  
being used to file this Stipulation. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that I  
have obtained concurrence in the filing of this document from the above-listed signatories.

16  
17  
18 By: /s/ Annette L. Hurst  
19 ANNETTE L. HURST

20  
21 [PROPOSED] ORDER

22 PURSUANT TO STIPULATION, IT IS SO ORDERED.

23  
24 Dated: \_\_\_\_\_, 2021

25  
26  
27 THE HONORABLE EDWARD M. CHEN  
28 United States District Judge